REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant response. Claims 1-42 remain pending in the case. Claims 1-42 are rejected.

35 U.S.C. §102(e)

Claims 1, 3-9, 11-17 and 19-42 are rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent 6,848,104 by Van Ee et al., hereinafter the "Van Ee" reference. Applicant has reviewed the cited reference and respectfully submits that the present invention as recited in Claims 1, 3-9, 11-17 and 19-42 is not anticipated by Van Ee in view of the following rationale.

Claims 1, 3-9, 11-17 and 19-23

Applicant respectfully directs the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

> A method of operating a plurality of types of consumer electronic devices interconnected to form a network, said method comprising:
>
> configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user;
>
> receiving a service request indicating an identity of a user;
>
> based on said identity, said resource manager determining whether said service request violates said access policy;
>
> provided said service request is permissible, said resource manager determining whether resources of said

network necessary for carrying out said service request are available; and

provided said resources necessary for carrying out said service request are available, said resource manager transmitting control signals to said network causing said plurality of types of consumer electronic devices to carry out said service request.

Independent Claims 9 and 17 recite a similar limitation. Claims 3-8 that depend from independent Claim 1, Claims 11-16 that depend on independent Claim 9, and Claims 19-23 that depend from independent Claim 17 provide further recitations of the features of the present invention.

Van Ee and the claimed invention are very different. Applicant understands Van Ee to teach a system for the clustering of task-associated objects for effecting tasks among a system and its environmental devices. In particular, Van Ee teaches a system for enabling user access to resources that provide for effecting tasks among the system and the environmental devices (col. 5, lines 11-15). In effect, Van Ee teaches a remote control device that provides a user with control of the specific functions of specific environmental devices (col. 6, lines 12-35). Moreover, Van Ee teaches a system wherein the active environment may be characterized by temporal parameters for controlling access to these specific functions during selected hours of selected days (col. 6, lines 50-67).

Van Ee does not anticipate the claimed embodiments of the invention because Van Ee teaches a system where a user is provided with access to

functions of environmental devices. In contrast, the claimed method is for "configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user" (emphasis added).

Van Ee teaches a method for managing the functionality of a consumer electronics system. Specifically, Van Ee teaches a system where devices of an active environment may be characterized by various parameters. As described in Van Ee, a TV may not be available to a certain user during selected hours on selected days. Also, various functions of the TV may be limited, such as blocking certain channels and limiting the ability to change the volume. Other parameters may dictate relationships of environmental devices (col. 6, lines 50-67). In particular, the parameters dictate how access to particular devices and particular functions of the devices are controlled.

As described in Applicant's specification, a policy statement is used to dictate conditions under which certain services can be provided to certain users (page 19, lines 20-24). Access may be granted to a particular electronic device based on the particular service request when compared to the access policy. In particular, the service request does not indicate network resources for carrying out the service request. Thus, the policy statement is not directly related to a specific device or devices. Rather, the policy statement dictates

conditions under which certain services are available, independent of devices used for effectuating the service.

Furthermore, Van Ee does not anticipate the claimed embodiments of the invention because Van Ee does not teach a system in which a service request indicates an identity a user. The present claim recites "receiving a service request indicating an identity of a user" (emphasis added). Accordingly, the identity of a user is received along with a service request, and the service manager determines whether the service request violates the access policy. In particular, the access policy used to dictate the usage of particular resources depending on the identity of a user.

In contrast, Van Ee is silent to describing how a particular user is identified. In particular, Van Ee does not teach, describe or suggest that a service request indicates the identity of a user, as claimed.

Claims 24-42

Applicant respectfully directs the Examiner to independent Claim 24 that recites that an embodiment of the present invention is directed to (emphasis added):

> A method of operating a network comprising consumer electronics devices, comprising the acts of:
>
> receiving a request from a user of the network, wherein the request comprises a request for output of a media content item without the user specifying a source providing the media content

item to the network and without the user specifying an electronic device of the network for the output; and

outputting the media content item if the user is permitted to receive the media content item and if an electronic device of the network is available to output the media content item.

Independent Claim 33 recites a similar limitation. Claims 25-32 that depend from independent Claim 24 and Claims 34-42 that depend from independent Claim 33 provide further recitations of the features of the present invention.

As described above, Van Ee and the claimed invention are very different. Applicant understands Van Ee to teach a system that enables a user to define plural objects as macros (col. 12, line 50 through col. 13, line 22). In particular, Van Ee teaches that macro objects are user defined (col. 12, lines 50-56).

Van Ee does not anticipate the claimed embodiments of the invention because Van Ee teaches a system where a user specifies an environmental device for output. But the claimed method is for "receiving a request from a user of the network, wherein the request comprises a request for output of a media content item without the user specifying a source providing the media content item to the network and without the user specifying an electronic device of the network for the output" (emphasis added). As described in Applicant's specification, a user request for output allows a user to select the content or service from the network without regard to devices that contain and provide the service (page 14, lines 2-5).

Van Ee teaches a system in which a user is allowed to define macro objects (col. 12, line 50 through col. 13, line 22). Van Ee teaches a system user configuration of a macro requires a user to select and preconfigure preferences by exercising the user interface and navigating through the interface's menus, submenus, icons and the like (col. 13, lines 6-12). Specifically, the devices included within a macro are user selected. Therefore, with reference to Figure 3 of Van Ee, macro objects 323 include environmental devices that are specified by the user. In particular, the macro objects as taught in Van Ee are configured by a user and include devices that are specified by the user. Therefore, Applicant respectfully submits that Van Ee does not teach or suggest "receiving a request from a user of the network, wherein the request comprises a request for output of a media content item without the user specifying a source providing the media content item to the network and without the user specifying an electronic device of the network for the output" as claimed (emphasis added).

Applicant respectfully asserts that nowhere does Van Ee teach, disclose or suggest the present invention as recited in independent Claims 1, 9, 17, 24 and 33, and that Claims 1, 9, 17, 24 and 33 are thus in condition for allowance. Therefore, Applicant respectfully submits that Van Ee also does not teach or suggest the additional claimed features of the present invention as recited in Claims 3-8 that are dependent on allowable base Claim 1, Claims 11-16 that are dependent on allowable base Claim 9, Claims 19-23 that are dependent

on allowable base Claim 17, Claims 25-32 that are dependent on allowable base Claim 24, and Claims 34-42 that are dependent on allowable base Claim 33. Applicant respectfully submits that Claims 3-8, 11-16, 19-23, 25-32 and 34-42 overcome the rejection under 35 U.S.C. § 102(e) as these claims are dependent on allowable base claims.

35 U.S.C. §103(a)

Claims 2, 10 and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Ee in view of United States Patent 6,826,624 by Fell, Jr., hereinafter the "Fell" reference. Claim 2 is dependent on base Claim 1, Claim 10 is dependent on base Claim 9, and Claim 18 is dependent on base Claim 17. Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 2, 10 and 18 is not anticipated nor rendered obvious by Van Ee in view of Fell.

As described above, Van Ee and the claimed invention are very different. In particular, Applicant respectfully submits that Van Ee does not teach or suggest "configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user" as claimed (emphasis added). In particular, the system as taught in Van Ee does not teach or suggest configuring a resource manager with an access policy that dictates a condition under which a particular service request is permissible

to a user. On the contrary, Van Ee teaches a system for providing access to functions of each environmental device. By teaching a system for providing access to functions of specific devices, Van Ee teaches away from the claimed embodiments.

Furthermore, Applicant respectfully submits that Van Ee does not teach or suggest "receiving a service request indicating an identity of a user," (emphasis added). In particular, Van Ee is silent to describing how a particular user is identified.

Moreover, the combination of Van Ee and Fell fails to teach or suggest the claimed embodiments because Fell does not overcome the shortcomings of Van Ee. Fell, alone or in combination with Van Ee, does not show or suggest "configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user" or "receiving a service request indicating an identity of a user," as claimed (emphasis added).

Applicant understands Fell to teach a method and apparatus for network resource access request redirection base on a requested resource identifier (Abstract). In particular, Fell teaches that a request is made for a specific resource (Abstract)

Applicant respectfully submits that Fell does not teach or suggest "configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user" as claimed (emphasis added). In contrast, by teaching a system for providing access to specific resources, Fell teaches away from the claimed embodiments.

Furthermore, Applicant respectfully submits that Fell does not teach or suggest "receiving a service request indicating an identity of a user," (emphasis added). In particular, Fell is silent to describing how a particular user is identified.

Applicant respectfully asserts that nowhere does the combination of Van Ee and Fell teach, disclose or suggest the present invention as recited in independent Claims 1, 9 and 17, and that Claims 1, 9 and 17 are thus in condition for allowance. Therefore, Applicant respectfully submits the combination of Van Ee and Fell also does not teach or suggest the claimed features of the present invention as recited in Claim 2 that is dependent on Claim 1, Claim 10 that is dependent on base Claim 9, and Claim 18 that is dependent on base Claim 17. Applicant respectfully submits that Claims 2, 10 and 18 overcome the rejection under 35 U.S.C. § 103(a) as these claims are dependent on allowable base claims.

CONCLUSION

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-42 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO L.L.P.

Dated: Oct 13, 2005

Matthew J. Blecher
Registration No. 46,558

Two North Market Street
Third Floor
San Jose, CA 95113
(408) 938-9060